

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA : Case No. CR-1-09-030
: (Barrett, District Judge)
vs. :
: **GOVERNMENT'S SENTENCING**
: **MEMORANDUM**
WILLIAM ROEHM :

Now comes the United States by and through Assistant United States Attorney Timothy D. Oakley and respectfully requests that the Court consider a reduction of the defendant's sentence pursuant to United States Sentencing Guidelines § 5K.1.

The United States Department of Probation (Probation) has recommended in Count 1 a sentence of 120 months based upon a sentencing calculation of an final guidelines offense level of 29 with a corresponding criminal history score of VI. Count 1 charged the defendant with Receiving, Possessing or Disposing of Stolen Weapons pursuant to Title 18 U.S.C. § 922(j). Count 1 carried a potential sentence of up to ten years imprisonment.

The United States would submit that the defendant has provided substantial assistance in the prosecution of others within the Southern District of Ohio and elsewhere. William Roehm has aided law enforcement in the investigation of others.

Therefore, the United States would respectfully request that the Court consider a reduction to an offense level of 20 with a corresponding criminal history VI, and within the guideline range of 70 to 87 months. Such a sentence would reward the defendant for his assistance and still adequately reflect the seriousness of the offense.

Respectfully submitted,

WILLIAM E. HUNT
Acting United States Attorney

s/Timothy D. Oakley
TIMOTHY D. OAKLEY (0039965)
Assistant United States Attorney
Attorney for Plaintiff
221 East Fourth Street
Suite 400
Cincinnati, Ohio 45202
(513) 684-3711
Fax: (513) 684-2047
Tim.Oakley @usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served upon James Bogen, Esq, Attorney for Defendant, by electronic filing, this 8th day of September 2009.

s/ Timothy D. Oakley
TIMOTHY D. OAKLEY #0039965
Assistant U.S. Attorney